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SAMSUNG SDI BRASIL LTDA.,
SHENZEN SAMSUNG SDI CO., LTD. and
TIANJIN SAMSUNG SDI CO., LTD.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

19 | In re: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

Case No. 07-5944 SC

MDL No. 1917

**STIPULATION AND [PROPOSED]
ORDER REGARDING INTERBOND
DISCOVERY TO OCCUR AFTER
SEPTEMBER 5, 2014**

|| This Document Relates to:

INTERBOND ACTION

Individual Case No. 3:11-cv-06275-SC

1 The undersigned Defendants (collectively, “Defendants”) and Plaintiff Interbond
2 Corporation of America (“Interbond”) have conferred by and through their counsel and, subject to
3 the Court’s approval, HEREBY STIPULATE AS FOLLOWS:

4 WHEREAS, September 5, 2014 is the deadline to complete fact discovery in the
5 Interbond action; and

6 WHEREAS, in the interest of conducting discovery in an efficient and streamlined
7 manner and avoiding the taking of unnecessary depositions, the parties have agreed not to proceed
8 at this time with depositions of Interbond employees who are uncertain or unlikely to be called by
9 Interbond as a witness at trial; and

10 WHEREAS, Interbond reserves its rights to call such employees or any other
11 individuals as trial witnesses; and

12 WHEREAS, Interbond and Defendants have conferred and agreed that, to the
13 extent Interbond identifies any individuals on its pretrial witness list whom have not been deposed
14 in this litigation, Defendants may depose those individuals before trial; and

15 WHEREAS, Interbond and Defendants agree to negotiate and cooperate in good
16 faith with respect to the scheduling and conduct of any depositions that may occur after September
17 5, 2014 pursuant to this stipulation, consistent with the Court's Discovery Protocol (Dkt. No.
18 1128); and

19 WHEREAS, Defendants and Interbond have conferred and agree that Interbond
20 may make a production of documents after the September 5, 2014 close of fact discovery, but no
21 later than September 12, 2014; and

22 WHEREAS, Defendants will therefore be unable to review and evaluate those
23 documents before the close of fact discovery:

24 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED between
25 counsel for the undersigned parties as follows:

26 1. To the extent Interbond identifies on its pretrial witness list any current or
27 former employee, or any other person within its power to produce as a witness, who has not
28 previously been deposed in this case. Defendants may notice and take the deposition of any such

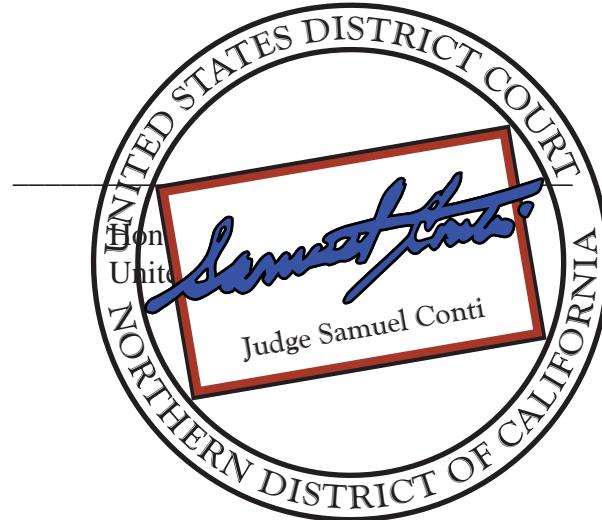
1 individual before trial. However, Defendants may not seek to depose Interbond employee Lary
2 Sinowitz in his individual capacity, who has previously appeared at deposition in this litigation
3 pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure.

4 2. Interbond will complete its outstanding document production no later than
5 September 12, 2014. To the extent Defendants wish to file a motion to compel with respect to that
6 production, they will do so no later than September 19, 2014.

7 The undersigned parties respectfully request that this stipulation be entered as an
8 Order of the Court.

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10 PURSUANT TO STIPULATION, IT IS SO ORDERED.

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13 Dated: 09/05/2014



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1 Dated: September 3, 2014

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29 Pursuant to Local Rule 5-1(i), the filer attests that the concurrence in the filing of
30 this document has been obtained from each of the above signatories.